

Attorney Docket: 071469-0306776  
Client Reference: PC6021A2  
Application No.: 10/705,397

#### REMARKS

Claims 1, 3, 5, 8, 9, 11, and 13 are amended hereby. No claims are added or canceled. Accordingly, after entry of this Amendment, claims 1-13 will remain pending.

In the Office Action dated April 7, 2005, the Examiner rejected claims 1-7 and 9-13 under 35 U.S.C. § 102(e) as anticipated by Beer et al. (U.S. Patent Publication No. 2002/0195201). Claim 8 was rejected under 35 U.S.C. § 103(a) as unpatentable over Beer et al. The Applicants respectfully disagree with both rejections and, therefore, respectfully traverse the same.

Claims 1-10 and 13 are patentably distinguishable over Beer et al. and the other references cited because these claims combine, among other features, an interface plate located on the second chamber, the interface plate comprising a flange portion abutting the second chamber and a frontal portion extending outwardly from the flange portion, wherein the frontal portion is constructed to engage the gate valve assembly in the first chamber, and wherein the interface plate establishes a continuous heat path from the second chamber to the gate valve assembly. Similarly, claims 11-12 are distinguishable over Beer et al. because these claims recite a method that combines a number of features including, among them, coupling an interface plate on the second chamber, the interface plate comprising a flange portion abutting the second chamber and a frontal portion extending outwardly from the flange portion, wherein the frontal portion is constructed to engage a gate valve assembly in the first chamber, wherein, when the first and second chambers are coupled to one another, the insulating plate surrounds the frontal portion and is disposed adjacent to the flange portion, and wherein the interface plate establishes a continuous heat path from the second chamber to the gate valve assembly. None of the references, including Beer et al., describe or suggest at least these combinations. Accordingly, the references cannot be relied upon properly to anticipate or render obvious claims 1-13.

Beer et al. describes an apparatus and method for thermally isolating a heat chamber. Specifically, referring to Fig. 2, the apparatus includes a heat chamber 102, a chamber 110, and an apparatus 104. (Beer et al. at paragraph [0039].) The apparatus 104, which is composed of a passageway 120 and a thermally isolating interface 108, is used to couple the heat chamber 102 to the chamber 110. (Beer et al. at paragraph [0041].) With

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respect to the embodiment illustrated in Fig. 4, the thermally isolating interface 108 includes a hole 404, so that the substrate may be transferred therethrough, and also includes bolt holes 406 so that the thermally isolating interface 108 may be sealed to the interface 114 of port 112. (Beer et al. at paragraph [0046].)

At no place in the disclosure, however, does Beer et al. describe an interface plate located on the second chamber, the interface plate comprising a flange portion abutting the second chamber and a frontal portion extending outwardly from the flange portion, wherein the frontal portion is constructed to engage the gate valve assembly in the first chamber, and wherein the interface plate establishes a continuous heat path from the second chamber to the gate valve assembly. Moreover, no where does Beer et al. describe or suggest a method including coupling an interface plate on the second chamber, the interface plate comprising a flange portion abutting the second chamber and a frontal portion extending outwardly from the flange portion, wherein the frontal portion is constructed to engage a gate valve assembly in the first chamber, wherein, when the first and second chambers are coupled to one another, the insulating plate surrounds the frontal portion and is disposed adjacent to the flange portion, and wherein the interface plate establishes a continuous heat path from the second chamber to the gate valve assembly. Accordingly, Beer et al. does not describe each and every feature recited by claims 1-13 and cannot be relied upon properly to anticipate any of claims 1-13.

In addition, Beer et al. does not suggest the combinations now recited by claims 1-13. Accordingly, the Applicant respectfully submits that Beer et al. cannot be relied upon to render obvious any of claims 1-13. Accordingly, the Applicant respectfully requests that the Examiner withdraw this rejection as well.

In view of the foregoing, the claims are now in form for allowance, and such action is hereby solicited. If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, he is kindly requested to contact the undersigned at the telephone number listed below.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

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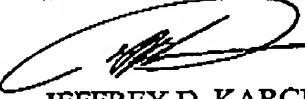
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Respectfully submitted,

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